

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE
ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
C.R. BARD, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A - C and Defendant C.R. Bard, Inc. ("Bard") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs. Other Defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Richard B. North, Jr.
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station, 201 17th Street, NW
Suite 1700
Atlanta, GA 30363
(404) 322-6000

Attorney for Defendant C.R. Bard, Inc.

/s/ Bryan F. Aylstock

AYLSTOCK, WITKIN, KREIS AND OVERHOLTZ

17 E. Main Street, Suite 200

Pensacola, FL 32563

T: 850-202-1010

F: 850-916-7449

Email: baylstock@awkolaw.com

Attorney for Plaintiff on Exhibit A

/s/ Brian A. Goldstein

CELLINO & BARNES

2500 Main Place Tower

350 Main Street

Buffalo, NY 14202-3725

716/854-2020

Fax: 716/854-6291

Email: brian.goldstein@cellinoandbarnes.com

Attorney for Plaintiff on Exhibit B

s/ Don K. Ledgard

CAPRETZ & ASSOCIATES

Suite 2500

5000 Birch Street

Newport Beach, CA 92660

949/724-3000

Fax: 949/209-2090

Email: dledgard@capretz.com

Attorney for Plaintiffs on Exhibit C

Dated: July 20, 2018

EXHIBIT A – AYLSTOCK, WITKIN, KREIS & OVERHOLTZ, PLLC

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:15-cv-14081	Penny J. Reed v. C.R. Bard, Inc., et al.

EXHIBIT B – CELLINO & BARNES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-cv-05467	Sandra K. Oliver v. C.R. Bard, Inc., et al.

EXHIBIT C – CAPRETZ & ASSOCIATES

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:12-cv-05970	Tana L. Hendrickson and Darrell Hendrickson v. C.R. Bard, Inc., et al.

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.